December 13, 2006

Katharine Kaplan Osdoba
ENERGY STAR Marketing Manager
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
MC 6202J
Washington, DC 20460

Dear Katharine:

On behalf of CEE, I am submitting the following comments on the ENERGY STAR draft digital-to-analog converter box (DTA) criteria. These comments were developed by the CEE Electronics Committee (Committee) in response to the first draft of the ENERGY STAR Program Requirements for DTAs issued on November 9, 2006. We commend EPA on its efforts to develop ENERGY STAR criteria for DTAs, given the fast-approaching transition from analog to digital broadcasting and the necessity of these boxes in the near future. CEE and its members look forward to working with EPA to determine the best way to ensure that this transition takes place as efficiently as possible. The organizations listed at the end of this letter have chosen to indicate their support for these comments.

Definitions

Digital-to-Analog Converter Box (DTA)

CEE concurs with EPA's definition of a DTA, and understands that this product category does not include more complex set-top boxes like satellite, cable, or multifunction boxes. We anticipate participating in the set-top box specification development process that EPA has indicated will begin in 2007.

We further support EPA's intention to align its definition of a DTA with the National Telecommunications and Information Administration's (NTIA) definition in an effort to maintain consistency in definitions at the national level. If EPA should decide to amend the final ENERGY STAR DTA specification to incorporate a modified NTIA DTA definition, CEE would look forward to engaging in this revision process, as well.

Operational Modes

CEE tentatively supports EPA's decision to rely on existing definitions of the different DTA operational modes – 'Off,' 'On,' and 'Sleep'—developed by the Consumer Electronics Association (CEA), in a similar effort to maintain consistency in definitions, as well as to leverage existing work. In particular, EPA's reliance on these definitions makes sense given the proposed use of CEA test procedures for DTAs. We caution EPA regarding the ambiguity of the definitions as they are written in the draft criteria, however. We would like to see some terms clarified, including specifically "principal functions" and "secondary functions" of DTAs. CEE wishes to ensure that DTA operational modes are described as clearly as possible so that the power consumption requirements can be applied appropriately.

Efficiency Requirements
CEE supports the efficiency requirements laid out in the draft criteria. We agree that all products to be covered under the ENERGY STAR DTA specification should meet the definition of a DTA used in the criteria.

The 'On Mode' and 'Sleep Mode' power consumption requirements given in Table 1 of the draft criteria seem reasonable based on EPA's explanation included in the Note below that table. We understand that it is difficult to establish these types of requirements for DTAs since no products are yet on the U.S. market, and that these levels are based on information from manufacturers and other stakeholders. We urge EPA to reevaluate these levels once the market is more developed and more data is available to ensure that they result in the expected 25 percent of products meeting the ENERGY STAR requirements. This 25 percent level is consistent with the ENERGY STAR program's approach across a variety of product areas, and has generally been shown to garner measurable energy savings.

Finally, CEE supports the inclusion of an auto-power down feature in the specification as defined in the draft criteria. We agree that this should be enabled at the factory as a default setting for the device, and that this setting should not be altered during the initial user set-up process and should persist until the user chooses to disable or change it manually.

Test Procedures
CEE supports EPA's intention to coordinate with industry and use existing CEA set-top box test procedures for the ENERGY STAR DTA specification. CEE is not currently prepared to comment on the applicability of the specific test procedures mentioned in the draft criteria. We expect that EPA will ensure that these test procedures meet the ENERGY STAR program's needs, and will modify them as needed if they do not.

Electronic Program Guides (EPG)
CEE commends EPA's efforts to make sure that unintended energy use does not occur as a consequence of EPGs. We do not have feedback on how best to accomplish this, but we look forward to further information on this feature and how to address it.

Effective Date
We support the proposed January 31, 2007 effective date. With the transition from analog to digital broadcasting only just over two years away, we agree that it is important to have an ENERGY STAR specification supported by industry, efficiency programs, and other interested stakeholders finalized as soon as possible.

Future Specification Revisions
As mentioned above, we understand that it is difficult to determine appropriate efficiency levels and other requirements since there are currently no DTAs on the U.S. market. We again urge EPA to reevaluate these requirements once the market is more developed and more data is available to ensure that they are appropriate. CEE would plan to participate in any future criteria revision processes.

Thank you again for the opportunity to comment. The Committee looks forward to the release of the final draft criteria shortly. If you have any questions about these comments, please direct them to Erica Schroeder, CEE Program Associate, at (617) 589-3949 ext. 231.

Sincerely,

Marc Hoffman
Executive Director

Supporting Organizations
American Council for an Energy Efficient Economy
BC Hydro
California Energy Commission
Efficiency Vermont
Energy Trust of Oregon, Inc.
Natural Resources Canada
New York State Energy Research Development Authority
Northeast Energy Efficiency Partnerships
Pacific Gas & Electric Company
Sacramento Municipal Utility District
Western Massachusetts Electric Company
Wisconsin Focus on Energy

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